

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ALABAMA

Dorris L. Carter

Plaintiff,

vs.

Civil Action No.

23-CV-407-KD-N

Mobile County Public School System

Defendant(s)

COMPLAINT

1. Plaintiff resides at 1011 Sarena Ct. Richmond Texas 77406
2. Name(s) of defendant(s) Mobile County Public School System
3. Location of principal office(s) of the named defendant(s) \_\_\_\_\_  
1 Magnum Pass  
Mobile, AL 36618
4. Nature of business of defendant(s) Public School
5. Approximate number of individuals employed by defendant(s) 7,200
6. The acts complained of in this suit concern:
  - (A) \_\_\_\_\_ Failure to employ me.
  - (B) \_\_\_\_\_ Termination of my employment.
  - (C) \_\_\_\_\_ Failure to promote me.
  - (D) ☒ Other acts as specified below: Discrimination towards  
race, Retaliation, Unfair pay, Sexual  
Misconduct

7. Plaintiff is:

(A) ☐ Presently employed by the defendant.

(B) ☒ Not presently employed by the defendant.

The dates of employment were \_\_\_\_\_

(1) ☐ Plaintiff was discharged.

(2) ☐ Plaintiff was laid off.

(3) ☒ Plaintiff left the job voluntarily.

8. Defendant(s) discriminated against me on account of my:

(A) ☒ Race

☐ Sex

☒ Color

☐ National Origin

☐ Religion

Therefore, I am bringing this action for employment discrimination pursuant to Title VII of the Civil Rights Act of 1964, specifically, 42 U.S.C. § 2000e-5.

(B) ☐ Physical disability

☐ Mental disability

Therefore, I am bringing this action pursuant to the American with Disabilities Act, specifically, 42 U.S.C. § 12117.

(C) ☐ Age

Therefore, I am bringing this action pursuant to the Age Discrimination in Employment Act of 1967, specifically, 29 U.S.C. § 626.

9. The name(s), race, sex, and the position or title of the individual(s) who allegedly

discriminated against me during the period of my employment with the defendant company is

(are) Ricky Broadhead, Caucasian, Male, Supervisor

10. The alleged discrimination occurred on or about 09/23/2021

11. The nature of my complaint, i.e., the manner in which the individual(s) named above

discriminated against me in terms of the conditions of my employment, is as follows: \_\_\_\_\_

On the morning of 09-23-2021 my Supervisor Ricky Broadhead told a story in front of myself and three of my fellow co-workers where he used the word Nigger to describe a African American. This was not the first instance in which Ricky Broadhead used the negative and belittling word. After Reporting, I was retaliated

12. The alleged illegal activity took place at Mobile County Public School System Againt by Removal from my Zone.

13. I filed charges with the Equal Employment Opportunity Commission regarding alleged discriminatory conduct by defendant(s) on or about 10/02/2021

I have attached a copy of the Notice-of-Right-to-Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on 08/03/2023

14. I seek the following relief:

(A) ☒ Recovery of back pay.

(B) ☒ Reinstatement to my former job, and any other relief as may be appropriate,

including injunctive orders, damages, costs and attorney's fees.

Date: 10-26-2023

Dani Carr  
Signature of Plaintiff

1811 Savana Ct.

Richmond Texas 774106  
Address of Plaintiff

(713) 940-7011  
Telephone Number of Plaintiff

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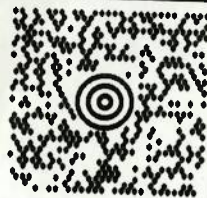
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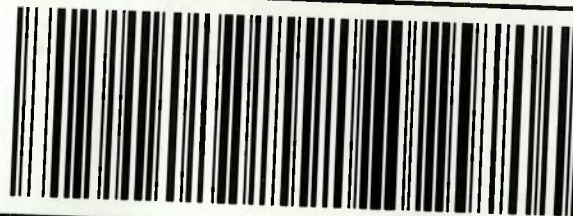
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